
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon. Leda Dunn Wettre, U.S.M.J.
: :
v. : Mag. No. 21-13275
: :
DOMINIQUE SACZAWA : **CRIMINAL COMPLAINT**

I, Monica Cueto, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent with the Federal Bureau of Investigation, and that this complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached page and made a part hereof.

/s/ Monica Cueto
Monica Cueto, Special Agent
Federal Bureau of Investigation

Special Agent Cueto attested to this Complaint
by telephone pursuant to F.R.C.P. 4.1(b)(2)(A).

August 31, 2021
Date

at New Jersey
State

Honorable Leda Dunn Wettre
United States Magistrate Judge
Name and Title of Judicial Officer

Leda Dunn Wettre
Signature of Judicial Officer

ATTACHMENT A

COUNT ONE
(Production of Child Pornography)

In or around August 2021, in the District of New Jersey, and elsewhere, the defendant,

DOMINIQUE SACZAWA,

did knowingly use, persuade, induce, entice, or coerce any minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using a means and facility of interstate and foreign commerce, namely by computer.

In violation of Title 18, United States Code, Sections 2251(a) and (e) and Title 18, United States Code, Section 2.

COUNT TWO
(Distribution of Child Pornography)

On or about August 27, 2021, in Sussex County, in the District of New Jersey, and elsewhere, the defendant,

DOMINIQUE SACZAWA,

did knowingly distribute child pornography, as defined in Title 18, United States Code, Section 2256(8), that had been mailed, and using any means and facility of interstate and foreign commerce, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

In violation of Title 18, United States Code, Section 2252A(a)(2).

COUNT THREE
(Advertisement of Child Pornography)

On or about August 27, 2021, in Sussex County, in the District of New Jersey, and elsewhere, the defendant,

DOMINIQUE SACZAWA,

did knowingly make, print, or publish, and cause to be made, printed, or published any notice or advertisement seeking or offering to receive, exchange, buy, produce, display, distribute, or reproduce, any visual depiction, and the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct and such visual depiction is of such conduct.

In violation of Title 18, United States Code, Section 2251(d)(1)(A).

ATTACHMENT B

I, Monica Cueto, am a Special Agent with the Federal Bureau of Investigation ("FBI"). I am fully familiar with the facts set forth herein based on my own investigation, my discussions with other law enforcement officers, and my review of reports, documents, and other items of evidence. Where statements of others are related herein, they are related in substance and in part. Because this Affidavit is being submitted for the sole purpose of establishing probable cause to support the issuance of a complaint, I have not set forth each and every fact that I know concerning this investigation. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

1. At all times relevant to this Complaint, defendant Dominique Saczawa ("SACZAWA") was a resident of Sparta, New Jersey.

2. In or around August 2021, the FBI commenced an investigation to identify subjects involved in the online sexual exploitation of minors. As part of this investigation, an undercover employee (the "UCE") with the FBI assumed an online profile in an internet application.

3. On or about August 27, 2021, the UCE joined a group digital conversation with SACZAWA and others, via an online messenger application. During the conversation, SACZAWA solicited other group participants to communicate and share content and/or images within the conversation and threatened to expel participants should they fail to do so. One participant inquired as to what content SACZAWA finds the "hottest" in response to which SACZAWA posted an image constituting child pornography (the "Subject Image-1"). One participant inquired as to the preferred age in response to which SACZAWA posted another image constituting child pornography (the "Subject Image-2"). SACZAWA then posted in reference to Subject Image-2, the "younger the better." Descriptions of the images are as follows:

- a. Subject Image-1 depicts a minor female, who appears to be 1-3 years old, with her genitalia exposed. The minor female's vagina and one buttocks cheek appear to have a white liquid substance of suspected ejaculate on them.
- b. Subject Image-2 depicts a minor female, who appears to be 5-7 years old, with light brown hair and wearing a black t-shirt with a white design on it. The minor female is sitting on the floor with her back leaning on what appears to be a white cabinet with her legs spread, leaving her genitalia exposed.

4. During the conversation, on or about August 27, 2021, SACZAWA shared with the UCE and other group participants at least two videos (hereinafter

“Subject Video-1” and “Subject Video-2”) constituting child pornography. Descriptions of the videos are as follows:

- a. Subject Video-1 is approximately 1 minute and 52 seconds long. Subject Video-1 depicts a naked minor female, who appears to be approximately 8-10 years old, lying on her stomach with her genitalia exposed. At the beginning of Subject Video-1, there appears to be an adult hand holding a white object and rubbing the object on and near the minor female’s vagina. As Subject Video-1 continues, the adult hands spread open the minor female’s legs as she is on her knees. Towards the end of Subject Video-1, the adult hands begin to rub the minor female’s buttock and legs and reposition the female on her knees. An adult male is then observed performing oral sex on the minor female.
- b. Subject Video-2 is approximately 12 seconds long. Subject Video-2 depicts two adult males who are both naked and a naked minor female, who appears to be approximately 4-7 years old. The faces of the adult males are not visible. The adult males are kneeling, while the minor female is on her hands and knees between them. The individuals appear to be on a bed and a “Hello Kitty” sheet can be seen beneath them. The adult male on the left portion of Subject Video-2 has his hands on the hips of the minor female and appears to be penetrating the minor female. At the same time, the minor female appears to be performing oral sex on the adult male on the right portion of the Subject Video-2. Law enforcement observed audio during Subject Video-2 that appears to be a language other than English.

5. The UCE engaged SACZAWA in a private conversation during which SACZAWA shared that she had taken some of her own. SACZAWA further described her sexual interactions with the minor child (“Minor Victim-1”) and explained the circumstances under which SACZAWA had access to Minor Victim-1. During this conversation, SACZAWA also posted at least one video (the “Subject Video-3”) and two images (the “Subject Image-3” and “Subject Image-4”) constituting child pornography. Descriptions of the video and images are as follows:

- a. Subject Video-3 is approximately 2 seconds long. Subject Video-3 depicts a naked Caucasian child lying on his/her stomach on what appears to be a bed. A Caucasian adult female with brown hair who is wearing a black t-shirt with a hot pink design lays alongside the child. During Subject Video-3, the female licks the child from the right buttocks cheek up to the lower back area of the child.
- b. Subject Image-3 depicts Minor Victim-1, who is naked, with Minor Victim-1’s head and shoulders resting on what appears to be a naked adult female’s left thigh. Both individuals are lying on what appears to

be a bed. Minor Victim-1's genitalia is visible in the image and Minor Victim-1's right arm appears in close proximity to the adult female's naked, shaved genitalia.

- c. Subject Image-4 depicts Minor Victim-1, who is naked and sitting in a chair. Minor Victim-1's legs are spread apart with the bottoms of Minor Victim-1's feet nearly touching, and Minor Victim-1's genitalia are visible in the center of the image frame of Subject Image-4.

6. Business records indicate that on or about August 26, 2021, at approximately 18:57:56 UTC, SACZAWA's account was accessed from an IP Address ("IP Address-1") that is associated with SACZAWA's residence in Sparta, New Jersey. Additionally, business records reflect that from at least on or about August 1, 2021 through on or about August 26, 2021, SACZAWA's account was regularly accessed from IP Address-1. The UCE received the videos and/or images in a State other than New Jersey, and therefore the videos and/or images necessarily traveled in and affected interstate commerce.

7. During the investigation, law enforcement lawfully acquired multiple digital photographs of SACZAWA. At least one such photo depicts an individual who appears identical to the Caucasian adult female depicted in Subject Video-3.

8. As such, law enforcement believes that SACZAWA is the adult female depicted in Subject Video-3, as well as Subject Image-3, with Minor Victim-1, that SACZAWA filmed or recorded this video and these images, and that SACZAWA subsequently disseminated the Subject Video-3, as well as Subject Image-3 and Subject Image-4, all of which she transmitted in interstate commerce.

